Biometric Air Exit: The use of facial recognition to confirm the identities of departing international airline passengers

Note: The Port has broad authority to establish policies that govern the activities of Port staff and the use of Port resources, to the extent such policies are consistent with federal law. Airlines operating at Port facilities are also subject to the Port's policies, consistent with their own federal obligations and the terms of their agreements with the Port – such as lease agreements or operating agreements with the Port, which varies on a case-by-case basis. The Port has very limited authority to influence, much less direct, the activities of federal agencies operating at Port facilities.

	Justified	Private	Equitable	Transparent	Lawful	Ethical	Voluntary
Key Words	Approval	Encryption; Disclosure; Storage	Accurate Rates; Training	Communication Plan & Accountability Report	State & Federal Regulations	Multiple Languages; Culturally Appropriate Engagement Plan; Training	Camera Locations to Prevent Unintended Capture
Port	If staff makes request to implement biometric air exit program approval must come from the Aviation Managing Director (AMD) after the AMD has notified the Port Executive Director and Port Commission. If request requires Commission authorization, memo to Commission must explain alignment with Biometric Principles. If procurement process is required, request information on alignment with Biometric principles.	If/when data is transmitted between the Port and CBP it must: a) occur over an encrypted connection; b) be exempt from state public discourse requirements so as to protect release of personally identifying information; c) be immediately deleted once complete; and d) be used for no other purpose If procurement process is required, request information on alignment with privacy protections.	Port to review and compare CBP accuracy rates before approval of any Port-requested biometric air exit program Port should develop training standards for handling facial recognition mismatching issues appropriately If procurement process is required, request information on alignment with equity protections	If port approves biometric air exit program implementation it will produce: a) a comprehensive communication plan; b) an accountability report each of which should be shared publicly through all Port communication channels. Each report should include all available information released by CBP. If procurement process is required, request information on alignment with transparency protections	Port staff should actively track and advocate for state and federal biometric regulations	If port approves biometric air exit program implementation It will work with relevant partners to engage local immigrant and refugee communities in multiple languages and in a culturally appropriate manner such that they can: a) be fully informed b) share concerns about incidents through a direct customer service procedure	If port approves biometric air exit program implementation The port should set standards for where and how facial recognition cameras at international departure gates to prevent unintended image capture and will train staff on procedures. If procurement process is required, request information on ways the vendor can help avoid unintended image capture
Private Sector Airlines	If airline makes request to implement biometric air exit program, approval must come from the Aviation Managing Director after the AMD has notified the Port ED and Port Commission with an explanation how the proposed implementation aligns with all relevant principles.	If/when data is transmitted between an airline and CBP it must: a) occur over an encrypted connection b) be immediately deleted once complete c) not be used for any other purpose	Port to review and compare CBP accuracy rates before approval of any airline-requested biometric air exit program All airline employees operating a biometric air exit program must be trained on facial recognition limitations, how to deal with inaccuracies, and cultural sensitivity	If port approves biometric air exit program implementation, airlines should cooperate with the Port on communications and accountability reports.	Airlines should engage with port in tracking and advocating state and federal biometric regulations	Airlines should work with the Port to educate local immigrant and refugee communities	If port approves biometric air exit program implementation, airline staff should receive training to prevent unintended capture and comply with Port standards
Federal Activities	The port does not have jurisdiction to approve or reject CBP decisions regarding biometric air exit implementation.	The port does not have jurisdiction over CBP's privacy policies or procedures.	The port does not have jurisdiction over CBP accuracy algorithm.	The port does not have jurisdiction to require CBP to share information.	CBP is subject to federal laws and regulations	The port does not have jurisdiction to require CBP compliance	CBP policy states that legal U.S. residents are allowed to opt-out of biometric screening
Feedback	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments:	These recommendations: Do not go far enough Are satisfactory Go too far Comments: